

EXHIBIT 2

From: Lori Schwartz <ls@robinsonbrog.com>
Sent: Monday, April 04, 2022 12:32 PM
To: Richards, Robert E.; Fred B. Ringel
Cc: Macksoud, Lauren
Subject: RE: 85 Flatbush

[WARNING: EXTERNAL SENDER]

Robert, I left a voicemail earlier in connection with your email below. If you or Lauren could please give me a call. I'm in my office today at 212 603 6334.

Regarding your below inquiry:

1. NYS recently filed an amended claim asserting \$635,682.55 in unsecured priority liabilities and an administrative tax claim asserting \$91,872.96 in administrative liabilities against the Hotel debtor;
2. Outstanding RE taxes aggregate approximately \$1,620,000;
3. Net professional fees and expenses for Debtor's counsel as of March 25, 2022 aggregate approximately \$236,000. Note that this is for informational purposes only and without prejudice to professionals' rights to seek court approval of all outstanding fees and expenses incurred in connection with these cases. Obviously, fees and expenses will continue to accrue as the cases proceed. Any applications for professional compensation will set forth the amounts due for that application's time period.

Thank you,

Lori A. Schwartz, Esq.
Robinson Brog Leinwand Greene
Genovese & Gluck P.C.
875 Third Avenue, 9th Floor
New York, New York 10022
(212) 603-6334

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From: Richards, Robert E. <robert.richards@dentons.com>
Sent: Thursday, March 31, 2022 1:25 PM
To: Fred B. Ringel <fbr@robinsonbrog.com>
Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; Lori Schwartz <ls@robinsonbrog.com>; William A. Rome <war@robinsonbrog.com>
Subject: RE: 85 Flatbush

In paragraph 18(l) of your objection to the TH Holdco Disclosure Statement, the Debtors ask us to disclose "the amount TH would fund for payment of Chapter 11 Administrative Expenses, and Priority Claims . . .". As you know from the email chain below and our phone conversations in February 2022, the Debtors agreed to provide us with their analysis of that since much of that information is not of public record and is in the knowledge of the Debtors and its professionals (including accrued professional fees to date). We first discussed that analysis back in early February 2022.

That analysis will also be relevant for us, the Court and other parties in interest to evaluate your recently filed disclosure statement and amended Chapter 11 plan.

Please provide us the analysis the Debtors prepared by Monday, April 4, 2022 at 11 am Eastern Time.



Robert E. Richards

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From: Fred B. Ringel <fbr@robinsonbrog.com>

Sent: Tuesday, February 15, 2022 12:54 PM

To: Richards, Robert E. <robert.richards@dentons.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; Lori Schwartz <ls@robinsonbrog.com>; William A. Rome <war@robinsonbrog.com>

Subject: Re: 85 Flatbush

[WARNING: EXTERNAL SENDER]

I will circulate a zoom call in.

Fred

Fred B. Ringel | Partner

Robinson Brog P.C. | 875 Third Ave | 9th Fl.

New York, New York 10022

Office: 212.603.6301 | Fax: 212.956.2164

Cell: 914.320.3455 (preferred)

E-mail: fbr@robinsonbrog.com

From: Richards, Robert E. <robert.richards@dentons.com>

Sent: Tuesday, February 15, 2022 8:38:27 AM

To: Fred B. Ringel <fbr@robinsonbrog.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; Lori Schwartz <ls@robinsonbrog.com>; William A. Rome

<war@robinsonbrog.com>

Subject: RE: 85 Flatbush

Yes that time works for me on Wednesday.



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From: Fred B. Ringel <fbr@robinsonbrog.com>

Sent: Monday, February 14, 2022 8:47 PM

To: Richards, Robert E. <robert.richards@dentons.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; Lori Schwartz <ls@robinsonbrog.com>; William A. Rome <war@robinsonbrog.com>

Subject: RE: 85 Flatbush

[WARNING: EXTERNAL SENDER]

Robert,

Can we set up a call for this Wednesday at 4:30 to continue our discussions?

Fred

Fred B. Ringel | Partner

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From: Richards, Robert E. <robert.richards@dentons.com>

Sent: Wednesday, February 9, 2022 4:01 PM

To: Fred B. Ringel <fbr@robinsonbrog.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; A. Mitchell Greene <amg@robinsonbrog.com>; Lori Schwartz <ls@robinsonbrog.com>

Subject: RE: 85 Flatbush

Let us know your availability for a further lawyers call.

The business people are also available for a business level discussion.



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From: Fred B. Ringel <fbr@robinsonbrog.com>

Sent: Monday, February 07, 2022 12:27 PM

To: Richards, Robert E. <robert.richards@dentons.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; A. Mitchell Greene <amg@robinsonbrog.com>; Lori Schwartz

<ls@robinsonbrog.com>

Subject: RE: 85 Flatbush

[WARNING: EXTERNAL SENDER]

Lori is working on sorting through the claims so we can respond to your questions regarding the cash needs. We are not there yet.

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From: Richards, Robert E. <robert.richards@dentons.com>

Sent: Monday, February 7, 2022 1:03 PM

To: Fred B. Ringel <fbr@robinsonbrog.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; A. Mitchell Greene <amg@robinsonbrog.com>; Lori Schwartz <ls@robinsonbrog.com>

Subject: RE: 85 Flatbush

Please let us know an update on timing of providing the analysis we discussed last week on cash amounts needed to confirm a Chapter 11 plan based on a credit bid and to have a further discussion generally.



Robert E. Richards

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From: Richards, Robert E.
Sent: Friday, February 04, 2022 1:45 PM
To: 'Fred B. Ringel' <fbr@robinsonbrog.com>
Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; A. Mitchell Greene <amg@robinsonbrog.com>; Lori Schwartz <ls@robinsonbrog.com>
Subject: RE: 85 Flatbush

Hopefully you were able to speak with your client by now.

Let us know some times that work for a follow up call next week.

 **Robert E. Richards**
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From: Fred B. Ringel <fbr@robinsonbrog.com>
Sent: Monday, January 31, 2022 9:42 AM
To: Richards, Robert E. <robert.richards@dentons.com>; Dorkey, III, Charles E. "Trip" <charles.dorkey@dentons.com>
Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; A. Mitchell Greene <amg@robinsonbrog.com>; Lori Schwartz <ls@robinsonbrog.com>
Subject: RE: 85 Flatbush

[WARNING: EXTERNAL SENDER]

Counsel,

Of course I have not yet seen anything regarding the transfer of the Madison's affiliate's position to your client. But taking your statement at face value, scheduling a call today is I not workable. Tomorrow, I am in court in the morning so I could do a call tomorrow afternoon. My preference would be at 2:00. As you may know, the name "TH HoldCo's" is used by a number of entities as their special purpose vehicle for this kind of investment. My client would like to know who they are dealing with moving forward. It would be helpful if you could provide that information.

Let me know if 2:00 tomorrow works for you. If not, I can do it later in the afternoon.

Fred Ringel

=====

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From: Richards, Robert E. <robert.richards@dentons.com>

Sent: Monday, January 31, 2022 9:44 AM

To: Dorkey, III, Charles E. "Trip" <charles.dorkey@dentons.com>; Fred B. Ringel <fbr@robinsonbrog.com>; Lori Schwartz <ls@robinsonbrog.com>

Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>

Subject: RE: 85 Flatbush

Otherwise I and Lauren can cover this initial call.

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From: Dorkey, III, Charles E. "Trip" <charles.dorkey@dentons.com>
Sent: Monday, January 31, 2022 8:27 AM
To: Richards, Robert E. <robert.richards@dentons.com>; 'fbr@robinsonbrog.com' <fbr@robinsonbrog.com>;
'ls@robinsonbrog.com' <ls@robinsonbrog.com>
Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; Dorkey, III, Charles E. "Trip" <charles.dorkey@dentons.com>
Subject: RE: 85 Flatbush

Today is tight but I could meet between 330 and 5

Tomorrow (Tuesday) is wide open

 **Charles E. "Trip" Dorkey, III**
Partner

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From: Richards, Robert E. <robert.richards@dentons.com>
Sent: Monday, January 31, 2022 8:46 AM
To: 'fbr@robinsonbrog.com' <fbr@robinsonbrog.com>; 'ls@robinsonbrog.com' <ls@robinsonbrog.com>
Cc: Macksoud, Lauren <lauren.macksoud@dentons.com>; Dorkey, III, Charles E. "Trip" <charles.dorkey@dentons.com>
Subject: 85 Flatbush

Dentons represents TH Holdco LLC which acquired the mortgage loan from the Madison affiliate last week. We will be filing the Rule 3001 claim transfer notice and our appearance this week.

Please let us know some times that work for you for an initial call today or tomorrow.

 **Robert E. Richards**
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